

# CE-Bar Volunteer Fire Department

Serving Travis County Rural Fire District #10

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 18, 1993

MS. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street NW Room 222  
Washington, DC 20554

Re: PR Docket No. 92-235

Dear Ms. Searcy:

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FCC MAIL ROOM

The CE Bar Volunteer Fire Department, a non profit corporation, is the contractor for fire suppression, fire prevention and emergency medical first responder service for the Travis County Rural Fire Prevention District #10 of Texas. Our district encompasses a ten square mile area in the Texas hill country west of Austin. Our area is suburban and residential in character and our Department has 25 volunteers, four fire apparatus and 21 radio units and a base/mobile relay operated in the Fire Radio Service.

The CE Bar VFD is typical of thousands of small public safety agencies which will be effected by the implementation of the proposed Part 88 but which will not comment because they are unaware of the impact of the rulemaking.

Our Department operates exclusively in the 150-174 Megahertz band and my comments mostly apply to that frequency range.

1. The mandatory schedule for change of technology in the original docket is absolutely to short a time period for small agencies to change to the new technology. Agencies such as CE Bar will require a minimum of 10 years from the date of action to be able to amortize the cost of existing systems and replace it with new technology.

The economic reality is that agencies like CE Bar will not be able to adopt new technology as rapidly as business or larger public safety users. The Commission must defend the rights and provide for the protection of small agencies in the change period.

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It is imperative that the rules layout a clear technology path for agencies such as ours. Our budget for communications equipment for an entire year is usually less than the present cost of two digital mobile radios. There is simply no room for us to invest in a dead end technology. Adoption of an interim technology with a minimum utilization period (perhaps 12.5 kilohertz for 10 years) followed by a reexamination of the then available technology would be acceptable. Likewise, a voluntary change schedule as has been suggested by some earlier comments would be acceptable.

2. CE Bar VFD is concerned that the reduction in transmitter deviation required to meet the 1996 deadline will negatively effect our ability to use tone paging to alert our responders to an emergency situation. I feel it is essential that emergency alert paging be allowed at the present level of transmitter deviation, compatible with existing paging receivers, until some alternative is technologically and economically available to small agencies.

3. Our location in the dry, steep hill and canyon country of central Texas is regarded as a very dangerous location for massive wildland fire, like the Oakland Hills fire in California. In the event of such a fire it will be imperative that we be able to intercommunicate with federal agencies responding to assist. Adoption by the Commission of a 5 kilohertz channel plan at VHF high band may limit our ability to communicate on 6.25 kilohertz channels adopted by federal agencies.

4. The most significant problem for users of the 150-174 megahertz spectrum is the mixing of mobile and mobile relay input and output frequencies. This is not addressed in Docket 92-235. CE Bar VFD suffers frequent interference from other legitimate users of "our" frequencies who operate mobile relay transmitters on the mobile input frequency. Pairing of high band frequencies into mobile and base pairs would double the utility of this frequency range even without changes in technology. I urge the commission to adopt a frequency pairing allocation table for 150 to 174 megahertz, and not allow exceptions.

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Thank you for the opportunity to comment on this action.

Sincerely,

A handwritten signature in black ink, appearing to read "Glen Reid". The signature is stylized with a large, looping "G" and a long, horizontal stroke for the "R".

Glen Reid  
Director  
CE Bar Volunteer Fire Department  
2302 San Juan Drive  
Austin, TX 78733